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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF JORDAN JAFFE IN
SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PORTIONS OF
WAYMO'S OBJECTIONS TO
IMPROPER EVIDENCE CITED IN
DEFENDANTS' PRELIMINARY
INJUNCTION SUR-REPLY**

1 I, Jordan Jaffe, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am a partner at the law firm Quinn Emanuel Urquhart & Sullivan, LLP,
4 counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth
5 in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal Portions of Waymo’s Objections to Improper Evidence Cited in Defendants’ Preliminary
8 Injunction Sur-Reply (the “Administrative Motion”). The Administrative Motion seeks an order
9 sealing the following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Objections to Improper Evidence Cited in Defendants’ Preliminary Injunction Sur-Reply (“Waymo’s Objections”)	Highlighted Portions	Waymo (green highlighting); Uber ¹ (blue highlighting)

14 3. Waymo’s Objections contain references to Waymo’s trade secret information, which
15 Waymo seeks to seal. The references describe elements of at least two asserted Waymo trade secrets,
16 and identify Waymo’s technology related to the confidential design and functionality of Waymo’s
17 proprietary autonomous vehicle system, which Waymo maintains as secret.

18 4. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 24-15)
19 and are valuable as trade secrets to Waymo’s business (Dkt. 24-3). The public disclosure of this
20 information would give Waymo’s competitors access to descriptions of the functionality of Waymo’s
21 autonomous vehicle system. If such information were made public, I understand that Waymo’s
22 competitive standing would be significantly harmed.

23 5. Waymo’s request to seal is narrowly tailored to those portions of Waymo’s Objections
24 that merit sealing.
25
26

27 ¹ “Uber” means Uber Technologies, Inc., Ottomotto LLC, and Otto Trucking LLC, collectively.
28

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on May 2, 2017.

Jordan Jaffe
Attorneys for WAYMO LLC